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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12

13 **RONALD SCOTT BEATTY,**

14
15 Plaintiff,

Case No. 2:13-cv-1092-APG-GWF

16
17 v.

STIPULATED MOTION FOR
EXTENSION OF TIME TO
FILE REPLY TO DEFENDANT'S
RESPONSE TO PLAINTIFF'S MOTION
FOR REMAND/REVERSAL (FIRST
REQUEST)

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21 **CAROLYN W. COLVIN,**
22 **ACTING COMMISSIONER OF SOCIAL SECURITY,**
23 Defendant.
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26 Comes now Plaintiff, by and through his attorney, JOSHUA R. HARRIS, ESQ.,
27 requesting a THIRTY (30) day extension of time, to file **Plaintiff's Reply to Defendant's Response.**
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1 Plaintiff's current deadline for this brief is May 23, 2014. Opposing Counsel has no objection to this
2 request for an extension, and has stipulated to this filing by email.

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4 The extension is necessary because the Harris firm's appellate contract associate, attorney
5 Linda Ziskin, very recently experienced the death of her mother. She would appreciate having some
6 time for bereavement, and to catch up with delayed work while she was out of town. It is therefore
7 respectfully requested that Plaintiff be granted a 30 day extension of time to file the **Reply to**
8 **Defendant's Response to Plaintiff's Motion for Remand and/or Reversal**, up to and including
9 June 23, 2014.
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13 DATED this 14th day of May, 2014.

14 /s/ Joshua R. Harris

15 **Joshua R. Harris**

16 Nevada State Bar No. 9580

17 Ph: (702) 444-4392

Of Attorneys for Plaintiff

18 /s/ Heather M. Moss (signed by email authorization)

19 **Heather M. Moss**

20 Assistant Regional Counsel

21 Office of the General Counsel, Region IX

22 Social Security Administration

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24 **IT IS SO ORDERED.**

25 
26 United States Magistrate Judge

27 DATED: 5/14/2014
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